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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MICHELLE Y. HOOPER, an individual;  
TIMOTHY W. HOOPER, an individual,

Plaintiffs,

v.

SPECIALIZED LOAN SERVICING, LLC, a  
foreign limited-liability company,

Defendant.

Case No.: 2:18-cv-00542-APG-CWH

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND THE TIME FOR  
DEFENDANT TO ANSWER**

**(Second Request)**

Plaintiffs Michelle Y. Hooper and Timothy W. Hooper ("Plaintiffs"), by and through their counsel of record, The Law Office of Kevin L. Hernandez, and Defendant Specialized Loan Servicing, LLC, ("SLS"), by and through its counsel of record, Greenberg Traurig, LLP, stipulate and request that the Court extend the time by which SLS must respond to the Complaint by fourteen (14) days up to, and including, **August 22, 2018**. This Stipulation is made and based upon the following:

1. Plaintiffs filed their Complaint on March 26, 2018, in which they allege SLS violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et. seq.* ECF No. 1.
2. An Amended Summons was issued on April 3, 2018. ECF No. 6.
3. The Amended Summons was returned executed on April 13, 2018. ECF No. 7. The Amended Summons was served on National Registered Agents, Inc., in Carson City, Nevada. *Id.*

4. National Registered Agents, Inc., is not SLS' registered agent. Rather, SLS' registered agent with the Nevada Secretary of State is the United Agent Group, Inc., located in Las Vegas, Nevada. Thus, SLS was not served with the Summons and Complaint.
5. Plaintiffs moved for a Clerk's entry of default on June 12, 2018 (ECF No. 8) which was granted the following day (ECF No. 9). Plaintiffs thereafter filed a Motion for Default Judgment on July 5, 2018. (ECF No. 10).
6. SLS became aware of this lawsuit and retained counsel. The Court granted the parties' stipulation to vacate the Clerk's entry of default, withdraw Plaintiffs' motion for default judgment, and extend the time for SLS to answer to August 8, 2018. ECF No. 12.
7. Counsel for Defendant has been preparing for trial in a separate matter and has not yet had an opportunity to review the matter and consult with Defendant regarding an appropriate response to the Complaint, taking into account the exercise of due diligence.
8. In light of the foregoing, the parties agree that SLS shall have up to, and including, **August 22, 2018**, to respond to the Complaint.
9. This is the second request for an extension of time. This Stipulation is entered into in good faith and not for purposes of delay.

DATED this 6<sup>th</sup> day of August, 2018.

DATED this 6<sup>th</sup> day of August, 2018.

/s/ Jason Hicks  
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JASON HICKS, ESQ.  
*Attorneys for Defendant*

/s/ Kevin Hernandez  
KEVIN L. HERNANDEZ, ESQ.  
*Attorneys for Plaintiffs*

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: August 7, 2018